

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA

v.

Case No. 3:07CR00001

KEVIN ALFRED STROM

MOTION FOR CONTINUANCE

Comes now the defendant, KEVIN ALFRED STROM, and represents the truth of the following:

1. Kevin Alfred Strom was indicted by the grand jury on January 3, 2007, on charges of possession of child pornography and witness tampering, in violation of 18 U.S.C. §§ 2252A and 1512, respectively.

2. The case is set for a jury trial on March 15-16, 2007.

3. The seized evidence in this case includes four computers with multiple hard drives, which include voluminous amounts of material. Counsel has not had adequate time to review this evidence.

4. Counsel expects that the government will use testimony of expert witnesses and reports of such have not yet been made available for review.

5. The Speedy Trial Act, 18 U.S.C. 3161 §§ 3167(h)(8)(A) and (8)(B)(iv), recognizes that it is proper to grant a continuance on the motion of counsel to serve the ends of justice in order to afford counsel the reasonable time necessary for effective preparation.

6. This case has not previously been continued.
7. The government does not object to this continuance request.
8. An alternative trial date of June 20-21, 2007, has been arranged with the clerk's office and is available to other counsel of record.

WHEREFORE, your defendant prays that the court continued the trial of this case to June 20-21, 2007.

Respectfully submitted,

KEVIN ALFRED STROM
By Counsel

Counsel:

S/Andrea L. Harris
Andrea L. Harris
Asst. Federal Public Defender
VSB 37764
401 E. Market Street, Suite 106
Charlottesville, VA 22902
Tel (434) 220-3380
Counsel for Kevin Alfred Strom

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: counsel of record; and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: none.

S/Andrea L. Harris
Andrea L. Harris
Asst. Federal Public Defender
VSB 37764
401 E. Market Street, Suite 106
Charlottesville, VA 22902
Tel (434) 220-3380
Andrea_Harris@fd.org